

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
LARONDA MARTIN
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
LaRonda_Martin@fd.org

6 Attorney for James Fredrick Greene
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 JAMES FREDRICK GREENE,
15 Defendant.

Case No. 2:21-cr-00060-APG-BNW

MOTION TO CONTINUE
SENTENCING HEARING
(Second Request)

16
17 THIS MOTION TO CONTINUE, prepared by Rene L. Valladares, Federal Public
18 Defender, and LaRonda Martin, Assistant Federal Public Defender, counsel for James Fredrick
19 Greene, hereby requests that the Sentencing Hearing currently scheduled on November 10,
20 2022, be vacated, and continued to no sooner than December 16, 2022.

21 The defendant submits the following reasons:

- 22 1. Undersigned counsel needs additional time to prepare mitigation in support of
23 the Sentencing Hearing.
24 2. An expert videographer has been retained by the Office of the Federal Public
25 Defender to prepare a sentencing mitigation video. Additional time to meet with the Defendant,
26 his family, and other witnesses is necessary. Moreover, the expert videographer advised that

1 this extra time is required to complete the pre-production, production, and postproduction
2 editing of the sentencing video.

3 3. Undersigned counsel is unavailable during the week of December 26, 2022
4 through December 31, 2022.

5 4. The defendant is not in custody and agrees with the need for the continuance.

6 5. The government, through the Assistant United States Attorney, Daniel J.
7 Cowhig, is opposed to the continuance.

8 This is the second request for a continuance of the sentencing hearing.

9 And DATED this 12th day of October, 2022.

10
11 RENE L. VALLADARES
12 Federal Public Defender

13 By /s/ LaRonda Martin
14 LARONDA MARTIN
15 Assistant Federal Public Defender
16
17
18
19
20
21
22
23
24
25
26

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JAMES FREDRICK GREENE,

7 Defendant.
8

Case No. 2:21-cr-00060-APG-BNW

ORDER

9
10 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
11 Thursday, November 10, 2022 at 1:30 p.m., be vacated and continued to December 20, 2022
12 at the hour of 1:30 p.m. in Courtroom 6C; or to a time and date convenient to the court.

13 DATED this 26th day of October, 2022.

14 
15

16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26